

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT HUNTINGTON

HERSHEL WOODROW "WOODY"  
WILLIAMS,

Plaintiff,

Civil Action No. 3:19-CV-00423

v.

Honorable Judge Johnston

BRYAN MARK RIGG, an individual;  
STACKPOLE, INC., a Pennsylvania  
Corporation; and THE ROWMAN &  
LITTLEFIELD PUBLISHING GROUP, INC.,  
a Delaware Corporation,

Defendant.

RESPONSE TO MOTION TO COMPEL DISCOVERY

Now comes the nonparty, The Woody Williams Foundation, Inc. (the "Foundation") and in response to the Motion to Compel Discovery, has responded to Nos. 1, 2, 3, 4, and 12 of the Subpoena. The parties hereto have agreed to sharing the responses electronically via secure link through Microsoft OneDrive, and the same has been forwarded to counsel.

THE WOODY WILLIAMS FOUNDATION, INC.

By Counsel

/s/ Christopher M. Davis

Christopher M. Davis (9050)

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing ***“Response to Motion to Compel Discovery”*** was served via the CM/ECF system on the 26<sup>th</sup> day of May, 2021, which will send notice to the following participants:

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/s/ Christopher M. Davis

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